

## REMARKS

Claims 1, 5-7, 10-11, and 13-23 are pending herein.

I. The obviousness rejections of claims 1, 5-7, 10, 11, and 13-23 based on Fujino (US 7,178,110) in view of Martinez (US 6,271,846), as noted on page 2 of the Office Action.

The USPTO respectfully rejects claims 1, 5-7, 10, 11 and 13-23 under 35 U.S.C. § 103(a) as being unpatentable over Fujino in view of Martinez. Claims 1, 7, and 19 are independent claims.

A. The cited references do not teach or suggest wherein an operator or user can input a name that does not exist in the storage medium as the first name and the second name in the inputting step, as claimed in claims 1, 7, and 19.

Independent claim 1 claims in relevant part:

“wherein an operator or user can **input a name that does not exist in the storage medium** as the first name and the second name in the inputting step.”  
(emphasis added herein)

Independent claims 7 and 19 claim similar limitations. No new matter is added by the amendments. Support for the amendments is found in present Figure 7 and on page 16, lines 11-21 of the present specification. Regarding these limitations, it is respectfully not seen where the cited references teach or suggest the claimed structure quoted above.

For example, the USPTO respectfully argues on page 5 of the Office Action that Fujino in view of Martinez teaches “inputting the first name and the second name with an inputting device” and searching the plurality of directory structures based on the inputted first name and second name. However, as explained in detail below, it is respectfully asserted that **Fujino and Martinez only teach that a user can select an existing name from a list of preexisting directory structures.** Thus, the cited references do not teach or suggest wherein an operator or user can input a name that does not exist in the storage medium as the first name and the second name in the inputting step, as claimed in claims 1, 7, and 19.

In particular, Fujino is directed to a “file processing apparatus” (Fujino column 1, line 65) where “it is preferable that the selected file storage means stores files selected from among a plurality of folders.” (Fujino column 2, lines 42-44). Specifically, as seen in Figures 11 and 12 column 7, lines 5-14 of Fujino, a window W’ includes a folder tree display window W4 where **“files in the folders that are selected in the folder tree display window W4** are displayed by the file display portion 11 in the file display window W1.” As further explained at column 7, lines 18-32 of Fujino, “[i]f the user selects a folder in the folder tree display window” then the procedure continues and “files in the selected folder are displayed by the file display portion 11.” It is respectfully important to note that in Fujino, **the user is only selecting from pre-existing folders or files that exist in window W’, and not wherein an operator or user can input a name that does not exist in the storage medium as the first name and the second name in the inputting step**, as claimed in claims 1, 7, and 19. In other words, a user in Fujino cannot input a first name and a second name that is not already displayed on the video display terminal.

Additionally, Martinez respectfully does not overcome these deficiencies in Fujino. In Martinez it is noted that “a user desires to created a customized directory tree “ (Martinez column 3, line 35) and “the present invention relates to a method and system for reanchoring branches of a directory tree” (Martinez column 4 lines 64-66). For example as seen in column 7, lines 1-28 of Martinez, **when a pre-existing directory tree member is selected** by an operator using a graphical pointer 40 the selection allows a user to perform a tree reanchoring process. Similar to Fujino, it is respectfully important to note that in Martinez, **the user is only selecting from among pre-existing directory tree members, and not wherein an operator or user can input a name that does not exist in the storage medium as the first name and the second name in the inputting step**, as claimed in claims 1, 7, and 19. In other words, a user in Martinez cannot input a first name and a second name that is not already displayed on the video display terminal.

It is respectfully noted that Martinez mentions a keyboard as a secondary selection switch at column 7, lines 16-17. However **this keyboard of Martinez is not an inputting device used to input a first and second name**, as claimed in claims 1, 7, and 19. Instead, the

keyboard is respectfully only used as a “secondary selection switch” (i.e., like right mouse button 47 seen in Figure 2 of Martinez).

Thus, overall it is respectfully asserted that the cited references do not teach or suggest wherein an operator or user can input a name that does not exist in the storage medium as the first name and the second name in the inputting step, as claimed in claims 1, 7, and 19.

In contrast, present Figures 7 illustrates one possible embodiment of the claimed structure quoted above. For example, as explained on page 16 of the present specification, **a user can use an inputting device (such as keyboard 6) to input names such as “ImageDir” as the first name and “IMGD1” as the second name.** As further explained on pages 16-17 of the present specification, the plurality of directory structures are searched based on the first and second name inputted by the inputting device, as claimed in claims 1, 7, and 19.

The specifically claimed methods and apparatus of claims 1, 7, and 19 is important and non-trivial because it results in significant advantages over conventional methods and apparatuses. For example, in the methods and apparatus of claim 1, 7, and 19, **an operator or user can input a name that does not exist in the storage medium as the first name and the second name.** In contrast, in Fujino and Martinez, because the first name and the second name are only selected from the directory tree structure, the user is only selecting from preexisting names. Thus, a user in Fujino and Martinez would not be able to enter a first name and a second name that is not shown on the display terminal or that does not already exist in the storage medium.

#### B. The dependent claims.

As noted above, it is respectfully asserted that independent claims 1, 7 and 19 are allowable, and therefore it is further respectfully asserted that dependent claims 5-6, 10, 11 and 13-23 are also allowable.

II. Conclusion.

Reconsideration and allowance of all of the claims is respectfully requested.

If there are any additional charges with respect to this Amendment or otherwise, please charge them to Deposit Account No. 06-1130.

Please contact the undersigned for any reason. Applicants seek to cooperate with the Examiner including via telephone if convenient for the Examiner.

Respectfully submitted,

CANTOR COLBURN LLP

By /Daniel P. Lent/  
Daniel P. Lent  
Registration No. 44,867

Date: September 3, 2008  
CANTOR COLBURN LLP  
20 Church Street  
22nd floor  
Hartford, CT 06103-3207  
Telephone (860) 286-2929  
Facsimile (860) 286-0115  
Customer No.: 23413